

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	CASE NO. 12CR00144-1-PB
)	CASE NO. 14CR00081-1-PB
HIEU MINH NGO)	
_____)	

**DEFENDANT HIEU MINH NGO’S
MOTION FOR DOWNWARD VARIANCE**

Defendant Hieu Minh Ngo (“Mr. Ngo”) respectfully moves this Court for a downward variance from the applicable advisory Sentencing Guidelines range pursuant to the factors set forth in 18 U.S.C. § 3553(a). In support of this motion, Mr. Ngo relies on and incorporates by reference the factual and legal arguments set forth in his Sentencing Memorandum and Request for Downward Variance dated June 8, 2015.

WHEREFORE, Defendant Hieu Minh Ngo respectfully requests that the Court vary downward from the applicable advisory Sentencing Guidelines range for the reasons set forth in his Sentencing Memorandum and Request for Downward Variance.

Respectfully submitted,

HIEU MINH NGO

By his attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2015, a copy of the foregoing Motion for Downward Variance was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

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